

EXHIBIT 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, et al., <i>Plaintiffs,</i> v. GREGORY W. ABBOTT, et al., <i>Defendants.</i>	5:21-cv-844-XR
OCA-GREATER HOUSTON, et al., <i>Plaintiffs,</i> v. JOSE A. ESPARZA, et al., <i>Defendants.</i>	1:21-cv-0780-XR
HOUSTON JUSTICE, et al., <i>Plaintiffs,</i> v. GREGORY WAYNE ABBOTT, et al., <i>Defendants.</i>	5:21-cv-0848-XR
LULAC TEXAS, et al., <i>Plaintiffs,</i> v. JOSE EXPARZA, et al., <i>Defendants.</i>	1:21-cv-0786-XR
MI FAMILIA VOTA, et al., <i>Plaintiffs,</i> v. GREG ABBOTT, et al., <i>Defendants.</i>	5:21-cv-0920-XR

**INITIAL DISCLOSURES FOR PLAINTIFFS LULAC TEXAS, VOTO LATINO,
TEXAS ALLIANCE FOR RETIRED AMERICANS AND TEXAS AFT**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Plaintiffs LULAC TEXAS, VOTO LATINO, TEXAS ALLIANCE FOR RETIRED AMERICANS, and TEXAS AFT, by and through undersigned counsel, make the following initial disclosures.

These disclosures are based on the information in Plaintiffs' possession, custody, and control, as well as that which could be ascertained, learned, or acquired by reasonable inquiry and investigation. Plaintiffs further reserve the right to amend, supplement, clarify, or modify these disclosures to the extent additional information becomes available or is obtained through discovery (should this matter proceed to discovery), including in supplemental disclosures, further discovery responses, or as required by the Federal Rules of Civil Procedure.

A. Rule 26(A)(1)(A)(i): Witness Disclosures

Plaintiffs and their members or staff, including those listed below, may have discoverable information regarding the allegations in the complaint, including but not limited to the harm that they and/or other similarly situated Texas voters have suffered and will suffer absent a permanent injunction granting the relief that they seek in this case. As noted below, all Plaintiffs (including their staff and board members) should be contacted only through undersigned counsel. Persons in this category include, but are not limited to:

NAME	TITLE & CONTACT INFORMATION
Rodolfo "Rudy" Rosales, Jr.	State Director LULAC Texas <i>Contact through undersigned counsel</i>

Maria Teresa Kumar	President & CEO Voto Latino <i>Contact through undersigned counsel</i>
Zeph Capo	President Texas AFT <i>Contact through undersigned counsel</i>
Judy Bryant	Field Organizer Texas Alliance for Retired Americans <i>Contact through undersigned counsel</i>

Plaintiffs anticipate that present and former employees, agents, and associates of the Elections Division of the Texas Secretary of State's office will have discoverable information related, but not limited, to: the administration of elections in Texas; the voting history of Texas voters, including the method(s) by which they cast their ballots; the legislative and enforcement history of Senate Bill 1 ("SB 1"); the intended and actual impacts of SB 1, including the intended, anticipated, and likely impacts on Black and Latino voters; the State's purported justifications for SB 1; and any training or communications provided by the Elections Division to local election officials regarding SB 1. Persons in this category include, but are not limited to:

NAME	TITLE & CONTACT INFORMATION
John Scott	Secretary of State Office of the Texas Secretary of State James E. Rudder Building 1019 Brazos Street Austin, Texas 78701 (850) 245-6500
Jose Esparza	Deputy Secretary of State Office of the Texas Secretary of State James E. Rudder Building 1019 Brazos Street Austin, Texas 78701 (850) 245-6500
Keith Ingram	Director of Elections Office of the Texas Secretary of State James E. Rudder Building 1019 Brazos Street Austin, Texas 78701 (850) 245-6500

Plaintiffs anticipate that present and former members of the Texas Legislature will have discoverable information related, but not limited, to: the motivation behind and legislative history of SB 1, including its precursors SB 7 and HB 6; the intended impacts of SB 1, including the impacts on Black and Latino voters; the State's purported justifications for SB 1; and prior and current efforts by election officials and others to hinder or facilitate Black and Latino voters' participation in Texas elections. Persons in this category include, but are not limited to:

NAME	TITLE & CONTACT INFORMATION
Bryan Hughes	Texas State Senator P.O. Box 12068 Capitol Station Austin, Texas 78711 (512) 463-0101
Paul Bettencourt	Texas State Senator P.O. Box 12068 Capitol Station Austin, Texas 78711 (512) 463-0107
Brian Birdwell	Texas State Senator P.O. Box 12068 Capitol Station Austin, Texas 78711 (512) 463-0122
Bob Hall	Texas State Senator P.O. Box 12068 Capitol Station Austin, Texas 78711 (512) 463-0102
Jane Nelson	Texas State Senator P.O. Box 12068 Capitol Station Austin, Texas 78711 (512) 463-0112
Charles Schwertner	Texas State Senator P.O. Box 12068 Capitol Station Austin, Texas 78711 (512) 463-0105

Briscoe Cain	Texas State Representative Room E2.706 P.O. Box 2910 Austin, Texas 78768 (512) 463-0733
Travis Clardy	Texas State Representative Room E2.818 P.O. Box 2910 Austin, Texas 78768 (512) 463-0592
Jacey Jetton	Texas State Representative Room E2.716 P.O. Box 2910 Austin, Texas 78768 (512) 463-0710
Mike Schofield	Texas State Representative Room E2.410 P.O. Box 2910 Austin, Texas 78768 (512) 463-0528
Valoree Swanson	Texas State Representative Room E2.710 P.O. Box 2910 Austin, Texas 78768 (512) 463-0572
Andrew Murr	Texas State Representative Room E1.308 P.O. Box 2910 Austin, Texas 78768 (512) 463-0536
Trent Ashby	Texas State Representative Room E2.806 P.O. Box 2910 Austin, Texas 78768 (512) 463-0508
Charlie Geren	Texas State Representative Room GW.15 P.O. Box 2910 Austin, Texas 78768 (512) 463-0610
Stephanie Klick	Texas State Representative Room E2.608 P.O. Box 2910 Austin, Texas 78768 (512) 463-0599

Brooks Landgraf	Texas State Representative Room E1.324 P.O. Box 2910 Austin, Texas 78768 (512) 463-0546
J.M. Lozano	Texas State Representative Room 1W.4 P.O. Box 2910 Austin, Texas 78768 (512) 463-0463
Matt Shaheen	Texas State Representative Room E1.420 P.O. Box 2910 Austin, Texas 78768 (512) 463-0594

B. Rule 26(A)(1)(A)(ii): Document Disclosures

Based on the information reasonably available to them at this time, Plaintiffs identify the following categories of documents in their possession, custody, or control that they may use to support their claims or defenses in this matter: (i) documents related to the harm that Plaintiffs have suffered and/or will suffer as a result of SB 1, including public comments by Plaintiffs and their constituents, (ii) publicly available news reports and public coverage of SB 1, (iii) statements of Texas elected officials, legislators, and local officials, (iv) documents related to the legislative history of SB 1, including legislative debate videos, transcripts, public testimony, and bill history, and (v) publicly available data from previous elections.

C. Rule 26(A)(1)(A)(iii): Damages Disclosures

Plaintiffs are not seeking money damages. Plaintiffs seek declaratory and injunctive relief; their costs, disbursements, and reasonable attorneys' fees incurred in bringing this action, pursuant to 42 U.S.C. § 1988; and any other relief the Court deems proper. As appropriate and necessary, Plaintiffs will present evidence of their costs, disbursements, and attorneys' fees expended in pursuing this action.

D. Rule 26(A)(1)(A)(iv): Insurance Agreements

Plaintiffs are currently unaware of any insurance policy under which any person and/or insurance business may be liable to satisfy all or part of any judgment which may be entered in this action.

Dated: November 5, 2021.

Respectfully submitted,

/s/ Uzoma N. Nkwonta

Marc E. Elias*

Uzoma N. Nkwonta*

Kathryn E. Yukevich*

Joseph N. Posimato*

Meaghan E. Mixon*

Graham W. White*

ELIAS LAW GROUP LLP

10 G Street NE, Suite 600

Washington, D.C. 20002

Telephone: (202) 968-4490

melias@elias.law

unkwonta@elias.law

kyukevich@elias.law

jposimato@elias.law

mmixon@elias.law

Jonathan P. Hawley*

ELIAS LAW GROUP LLP

1700 Seventh Avenue, Suite 2100

Seattle, Washington 98101

Telephone: (206) 656-0179

jhawley@elias.law

John R. Hardin

Texas State Bar No. 24012784

PERKINS COIE LLP

500 North Akard Street, Suite 3300

Dallas, Texas 75201-3347

Telephone: (214) 965-7700

Facsimile: (214) 965-7799

johnhardin@perkinscoie.com

Counsel for Plaintiffs

*Admitted *Pro Hac Vice*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was sent via electronic mail to all counsel of record on the 5th day of November, 2021.

/s/ Kathryn E. Yukeyich
Kathryn E. Yukeyich

Counsel for Plaintiffs